

To: Michael.McAdams@hklaw.com (b) (6)
From: Argyropoulos, Paul
Sent: Fri 12/20/2013 11:54:34 AM
Subject: RE: intermediate feedstocks.

Hey,

Not sure if you are around Monday but if so maybe we can grab coffee or lunch.,.....

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

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Web: www.epa.gov

From: Michael.McAdams@hklaw.com [mailto:Michael.McAdams@hklaw.com]
Sent: Thursday, December 12, 2013 10:05 AM
To: Simon, Karl; Argyropoulos, Paul
Subject: intermediate feedstocks.

Karl, Paul, My hats off to you all for a very difficult and busy couple of months. Sorry to add to the myriad of issues you are currently trying to tackle. My members are extremely concerned with the ramifications of the current discussions concerning the definitions and applications for gaining access to RIN support in the discussion concerning intermediate feedstocks. In working with legal counsel and over a dozen companies we have prepared a white paper for your consideration which I have attached.

As I know the holidays are upon us and you have multiple other challenges I wanted to send you the document for your review. Obviously at the appropriate time I would be more than delighted to bring in a reflective delegation who would be impacted with a restrictive interpretation to discuss the finer point. Thank you.

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To: Argyropoulos, Paul (b) (6)
From: Michael.McAdams (b) (6)
Sent: Tue 3/26/2013 12:39:24 PM
Subject: FW: Argus US Ethanol PDF
20130322use.pdf

Paul: You should read Howard Gruenspec's quotes in this. I am sure Bob's head is exploding.

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From: Michael Whitney [mailto:(b) (6)]
Sent: Monday, March 25, 2013 5:00 PM
To: McAdams, Michael (b) (6)
Cc: Tyson Redpath
Subject: FW: Argus US Ethanol PDF

Check out the quote from the EIA guy saying that much of the mandate is going to get waived or modified...

I'm not sure why some random EIA official is saying something that can and may have had a market bearing impact. I can't imagine that the White House or EPA would want those comments out in the ether.

MW

From: Argus Media Email System [mailto:(b) (6)]
Sent: Friday, March 22, 2013 7:44 PM
To: (b) (6)
Subject: Argus US Ethanol PDF

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For Argus US Ethanol content questions:

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Argus US Ethanol

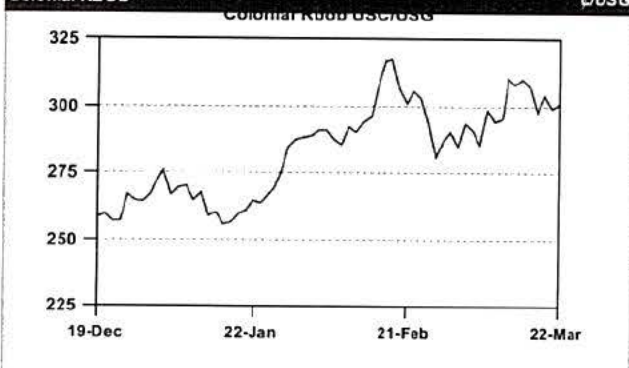
Price Summary

		Price	+/-
Ethanol			
Chicago (Argo)	¢/USG	255.00	-3.50
New York Harbor	¢/USG	267.00	-3.50
Fob Brazil Anhydrous	USD/m3	717.50	+37.50
Los Angeles Low CI	¢/USG	278.50	-9.50
CBOT Corn	¢/bushel	726.25	-6.75
Biodiesel			
SME New York Harbor B100	¢/USG	463.43	-11.20
SME Houston fob B100	¢/USG	461.43	-4.20
SME Chicago fob B100	¢/USG	488.43	+8.80
CBOT Soybean oil	¢/pound	50.43	+0.01

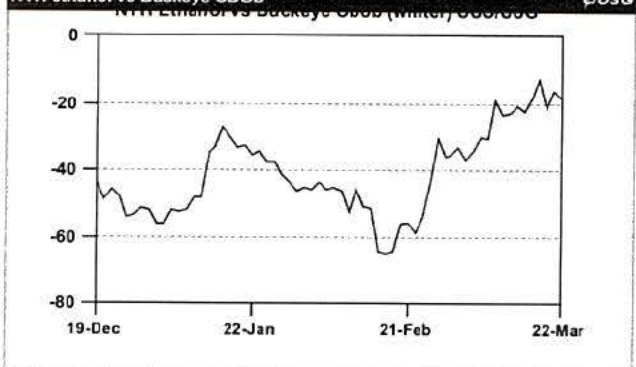
Biofuel Spreads

Ethanol Crush Spread	\$/bushel	-0.14
Heating Oil/Soybean Oil Spread	¢/USG	+0.10

Colonial RBOB



NYH ethanol vs Buckeye CBOB



Overview

- Prices for physical ethanol weakened Friday as all markets saw decreases of 3.5¢/USG or more from Thursday's assessments. Activity in the market was unusually low as many traders were otherwise occupied at the end of the week.
- Ethanol and biodiesel RIN prices fell slightly Friday as trade became thinner than the high levels seen earlier in the week.
- Physical biodiesel prices saw increased fluctuation Friday as New York Harbor and Houston markets were heard weaker, yet Chicago prices strengthened.
- The Brazilian market was quiet again Friday as companies continued to work on fulfilling long term domestic contracts. Bids in the domestic market are currently fetching much better prices than export bids, incentivizing domestic trade.

Ethanol

Prices for physical ethanol weakened Friday as all markets saw decreases of 3.5¢/USG or more from Thursday's assessments. Activity in the market was unusually low as many traders were otherwise occupied at the end of the week.

Chicago Rule 11 saw multiple deals occur in the morning session with prices down 6.5¢/USG from Thursday. Bids were seen at 255¢/USG with offers at 259¢/USG; deals were reported for delivery next week at 255 and 257¢/USG.

Corn and ethanol futures both fell Friday from prices assessed the day before. Corn was traded at 726.25¢/bushel, down 6.75¢/bushel. Below average temperatures have caused concerns in the market regarding the planting pace in the Corn Belt.

Meanwhile ethanol weakened only slightly at 254.4¢/USG, down 2.5¢/USG.

In the afternoon session, Chicago Argo saw two deals confirmed at 255¢/USG, down 3.5¢/USG from Thursday's assessment.

In Nebraska, prices for FOB rails cars were down 6.5¢/USG, trading at 255¢/USG for shipments to be delivered next week.

Ethanol

¢/USG	Low	High	+/-
Chicago			
Argo Prompt	254.00	256.00	-3.50
Argo Any Mar	254.00	256.00	-3.50
Rule 11 Prompt	255.00	257.00	-6.50
New York			
Any Mar	265.00	269.00	-3.50
US Gulf Coast/South			
Gulf Coast (Houston)	259.00	261.00	-3.50
Tampa	274.00	276.00	-7.00
Atlanta	266.00	268.00	-7.00
Dallas	257.00	259.00	-3.50
Nebraska			
Union Pacific (UP)	254.00	256.00	-6.50
Burlington Northern (BNSF)	252.00	254.00	-4.50
US West Coast			
Los Angeles Low CI	275.00	282.00	-9.50
Los Angeles High CI	274.00	281.00	-9.50
Brazil			
Fob Anhydrous (\$/m3)	700.00	735.00	+37.50
Fob Anhydrous (BRL/m3)	1409.94	1480.44	+83.02
Fob Hydrous (\$/m3)	570.00	625.00	-15.00
Fob Hydrous (BRL/m3)	1148.09	1258.88	-23.47
Cif Anhydrous (\$/m3)	750.00	790.00	0.00
Cif Anhydrous (BRL/m3)	1510.65	1591.22	+8.47

Biodiesel

¢/USG		Low/High Diff	Low/High Price	+/-
SME New York Harbor				
B100	Apr	+170.00/+180.00	458.43/468.43	-11.20
SME Houston fob				
B100	Apr	+168.00/+178.00	456.43/466.43	-4.20
SME Chicago fob (rail)				
B100	Apr	+195.00/+205.00	483.43/493.43	+8.80

RINs

¢/RIN	Low	High	+/-
Ethanol RINs			
2012	57.25	61.25	-1.75
2013	67.00	69.00	-1.50
Biodiesel RINs			
2012	66.00	69.00	-0.50
2013	79.00	80.00	-0.50
Cellulosic RINs			
2012	77.00	79.00	
2013	41.00	43.00	
Advanced Biofuel RINs			
2012	68.00	72.00	
2013	74.00	77.00	+1.50

Ethanol Forward Curves

	Chicago	New York
Mar	254.00/256.00	265.00/269.00
Apr	252.50/254.50	263.25/267.25
May	251.00/253.00	261.00/265.00
Jun	247.00/249.00	256.75/260.75

Futures

		Settlement	+/-
CBOT Ethanol			
¢/USG	Apr-13	254.40	-2.50
¢/USG	May-13	251.50	-2.90
¢/USG	Jun-13	247.70	-2.70
¢/USG	Jul-13	242.30	-2.90
CBOT Corn			
¢/bushel	May-13	726.25	-6.75
¢/bushel	Jul-13	708.50	-8.75
¢/bushel	Sep-13	596.75	-1.50
¢/bushel	Dec-13	565.25	-3.25
CBOT Soybean Oil			
¢/pound	May-13	50.43	+0.01
¢/pound	Jul-13	50.68	+0.01
¢/pound	Aug-13	50.57	0.00
¢/pound	Sep-13	50.39	+0.02
CBOT Soybeans			
¢/bushel	May-13	1440.50	-8.50
CBOT Soybean meal			
\$/t	May-13	419.30	-3.60
Nymex RBOB			
¢/USG	Apr-13	306.25	-0.81
Nymex RBOB Crack Spread			
\$/barrel	May-13	+34.44	-1.62
Nymex Heating Oil			
¢/USG	Apr-13	+288.43	-1.20

California Carbon Allowances

		Bid	Ask	Price	\$/mt
Vintage	Delivery				+/-
2013	Dec-13	14.15	14.25	14.20	-0.30
2014	Dec-14	14.00	15.00	14.50	-0.10

California Low-Carbon Fuel Credits*

	Bid	Ask	Price	\$/mt
Vintage				+/-
2013	38.00	42.00	40.00	+3.50

*Assessment updated weekly. Assessment is as of 22-Mar.

Current Month to Date Averages

March 2013	Averages
Ethanol	
Chicago (Argo) Prompt	¢/USG 253.89
New York Harbor Prompt	¢/USG 264.02
Los Angeles Low CI	¢/USG 277.84
Biodiesel	
SME Houston fob B100	¢/USG 481.04
SME Chicago fob B100	¢/USG 475.32

Related Markets

¢/USG	Low	High	+/-
New York RBOB Barge (83.7)			
	286.50	287.00	-1.56
New York CBOB Barge (83.7)			
	284.75	285.75	-1.56
Houston RBOB Colonial (83.7)			
	298.75	302.75	+1.81
Houston CBOB Colonial (85)			
	275.25	277.25	-2.31
Los Angeles CARBOB (84) month			
	303.12	305.12	+4.56
Houston ULSD Colonial			
	295.68	296.18	-0.13
Mont Belvieu Natural Gasoline			
	209.75	212.75	-1.00

A small volume trade was down for prompt delivery at a 6c premium to Friday's assessed price.

RINs

Ethanol and biodiesel RIN prices fell slightly Friday as trade became thinner than the high levels seen earlier in the week.

Ethanol credits came down 1.5c from the 69.5c/RIN assessed on Thursday. Deals were confirmed for 2013 ethanol credits at 67, 68, and 69c/RIN. No trades for 2012 ethanol RINs were confirmed.

After remaining at 80c/RIN two day's in a row, biodiesel credits weakened slightly, coming down 0.5c/RIN Friday. No trades were confirmed for the day.

Advanced biofuel RINs traded several times Friday, trading between 74 and 77c/RIN for 2013 credits.

Biodiesel

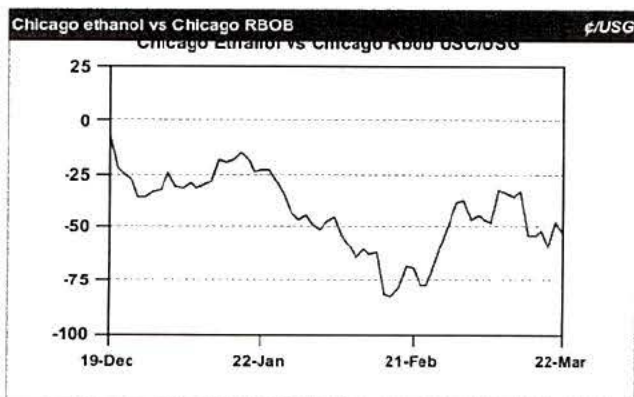
Physical biodiesel prices saw increased fluctuation Friday as New York Harbor and Houston markets were heard weaker, yet Chicago prices strengthened.

Sources noted that product in coastal markets which is currently cheaper cannot find its way into busier interior markets due to a lack of available railcars.

Chicago B100 SME was talked 10c higher than Thursday's assessed price of April Nymex +190c/USG, however no trades were detected at the new price of April Nymex +200c/USG.

The price for New York Harbor delivered fell 10c to April Nymex +175c/USG, according to market sources though no trades were confirmed. Meanwhile, Houston was heard slightly lower at April Nymex +173c/USG, down 3c from Thursday.

The heating oil/soybean oil spread narrowed down to 10.21c/USG, falling 1.28c from Thursday's assessed price. The April



Ethanol Deals Done

Market	Price (¢/USG)	Volume '000
Chicago Argo		
27 Mar - 6 Apr	255.00	5 bl
27 Mar - 6 Apr	255.00	5 bl
Chicago Rule 11		
24 - 30 Mar	257.00	145 USG
24 - 30 Mar	255.00	145 USG
24 - 30 Mar	257.00	435 USG
Nebraska - Union Pacific		
31 Mar - 6 Apr	255.00	377 USG
Prompt	261.00	58 USG

RINs Deals Done

Market	Price (¢/RIN)	Volume '000 RINs
Advanced Biofuel		
2013	77.00	295
Ethanol		
2013	68.00	250
2013	67.00	500
2013	67.00	1,000
2013	67.00	1,000
2013	69.00	1,000

heating oil contract was weaker Friday at 288.43c/USG, dropping 1.2c/USG.

Brazil

The Brazilian market was quiet again Friday as companies continued to work on fulfilling long term domestic contracts. Bids in the domestic market are currently fetching much better prices than export bids, incentivizing domestic trade.

Inventories have become tight as contracts continue to be fulfilled, while new product is not being produced fast enough to meet demand. Weather issues in Brazil have caused problems for mills attempting to start crushing for the new season.

Traders expect the market to strengthen once domestic obligations have been satisfied and exportation becomes a priority.

May Anhydrous EPA specification ethanol strengthened \$37.5/m³ Friday, with a bid seen at \$700/m³, and an offer at \$735/m³. Bids for June were seen in a \$15/m³ backwardation, while offers were heard at \$705/m³. No trades were confirmed for the day.

Latest News

Colonial to start biodiesel shipments on cycle 16

Colonial Pipeline will begin shipping biodiesel on a Georgia products stubline with cycle 16, the company said this morning.

The company's prototype biodiesel shipments on Line 17 connecting Atlanta to Bainbridge, Georgia, will start with cycle 16 diesel shipments. Shippers will inject the fuel at Griffin and move it to TransMontaigne storage tanks for injection into diesel shipments on Colonial's main Line 02 distillates trunk line.

Colonial cannot ship biodiesel on lines moving jet fuel, limiting expansion of the test shipments across much of its 5,500-mile (8,851km) pipeline system connecting the US Gulf coast to the east coast and New York Harbor. But the company is considering other areas of its system where it may introduce biodiesel shipments, chief executive Tim Felt said.

"Once we get this up and running, we'll learn from it, and see where there might be some other opportunities," Felt said.

EPA should waive 2013 biofuel requirements — AFPM

The Environmental Protection Agency (EPA) should waive mandated biofuel blending volumes this year while the agency and lawmakers sort out how to address a sudden jump in compliance costs, the country's refining association said today.

US refiners have warned a sudden price spike in renewable identification numbers (RINs) used to show compliance with US biofuel mandates could increase gasoline prices, discourage imports and entice more fraud in the marketplace.

The ultimate solution is to repeal the mandates, which are part of the Renewable Fuel Standard (RFS), according to American Fuel and Petrochemical Manufacturers (AFPM) president Charles Drevna. But the EPA could send immediate relief by waiving requirements for the next two to three years, he added.

"In the near-term, we believe the EPA should use the tools, however limited, they have available to ensure that there are no significant consumer or fuel supply impacts," Drevna said.

Prices for RINs, which refiners and importers use to show compliance with the federal RFS mandate, have climbed from 7¢/RIN early this year to more than \$1/RIN two weeks ago. Pricing of those credits have been slowly coming down in the last couple of weeks.

Obligated buyers secure RINs to show regulators they have paid for blending of an increasing volume of advanced biofuels and traditional ethanol and biodiesel each year, even if they cannot physically blend all the biofuel volumes into the transportation pool that is required. Companies with large marketing and blending operations tend to have more RINs than needed, while independent refiners who produce large volumes of fuel but do not directly blend or sell the product must purchase the excess RINs of other companies.

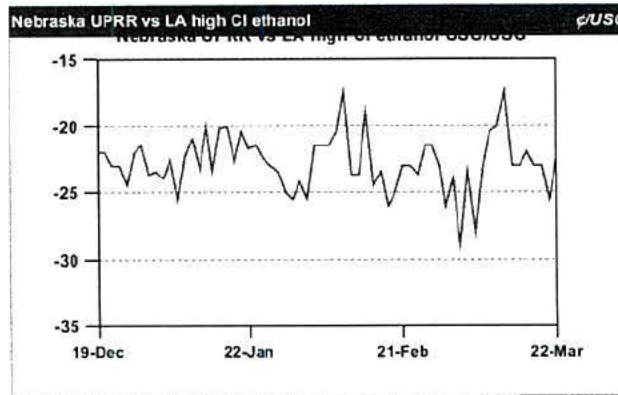
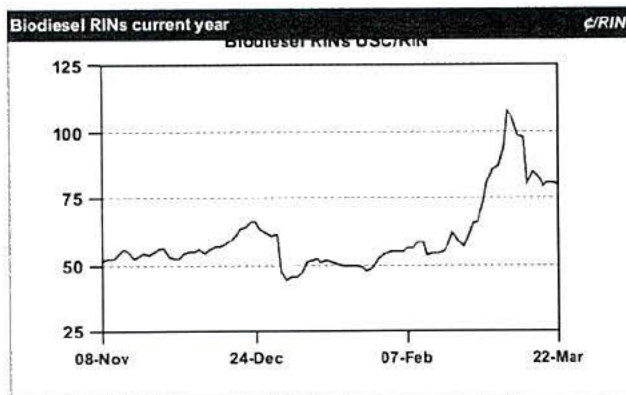
But the number of available RINs, though, is falling, while federally-required blend volumes continue to climb. Infrastructure constraints over the sale of higher-ethanol blends, falling gasoline demand and a general reluctance by the refining industry to give away yet more market share will combine to make complying next year almost impossible.

Ethanol advocates say refiners have created the problem themselves and so the law needs no reform.

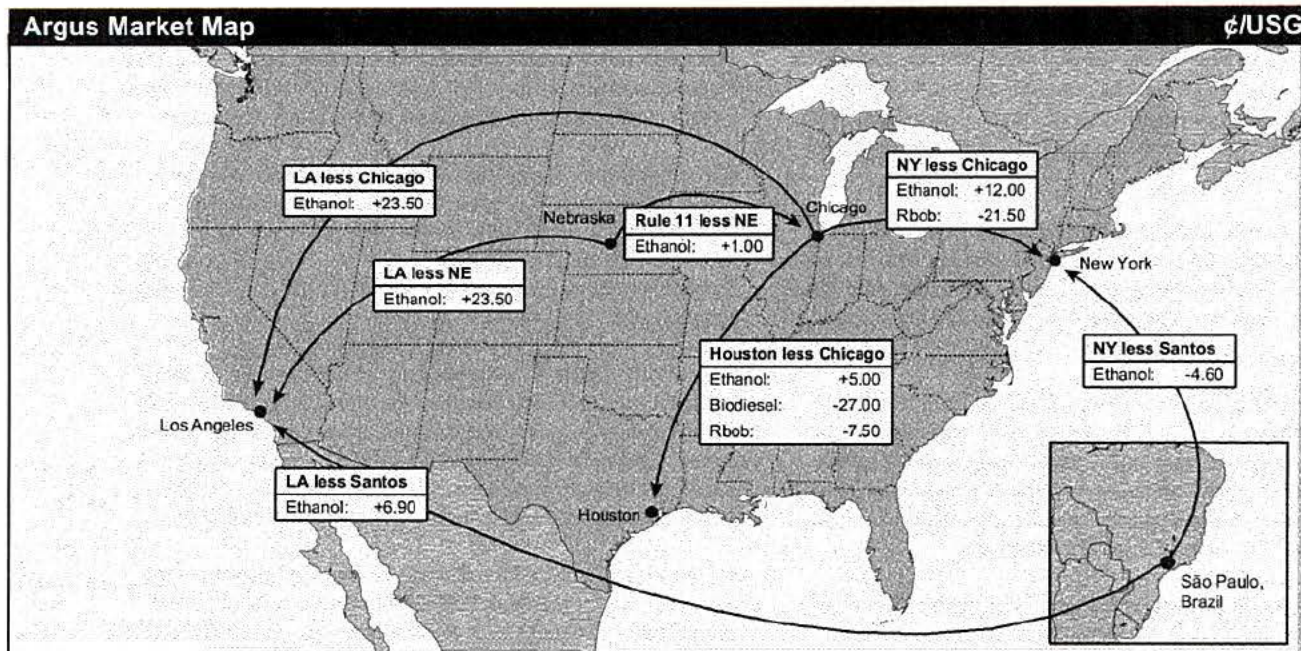
Any statutory changes will take lawmakers more time than available before the compliance costs begin to affect retail costs, and so EPA waivers were the best immediate route, Drevna said.

RFS requirements must be waived in 2014 — EIA

A top US Energy Information Agency (EIA) official said this week that federal officials will be forced to waive some Renewable Fuel Standard (RFS) requirements for ethanol blending starting in 2014 because lower gasoline demand coupled with



CANADA



rigid biofuel production requirements are colliding to drive up prices at the pump for consumers.

Years of recession, shifts in consumer preferences and new vehicle efficiency standards all have driven down US gasoline demand to a level below where Congress expected when it updated the RFS program back in 2007. That legislation set specific volume targets for biofuel use. The inability of the existing car and truck fleet to accommodate all the ethanol required is what the industry refers to as hitting the "blend wall."

EIA "expects that much of the legislated 2022 target of 36bn USG is going to end up being waived or modified," deputy administrator Howard Gruenspecht said yesterday at an EIA biofuels workshop. "In our view you are not going to get that high, there will be adjustments made under the Clean Air Act."

The Environmental Protection Agency (EPA) can administratively lower the legislated requirements for biofuels. The agency already has used that authority to reduce the targets for cellulosic, or so-called "advanced" biofuels.

Concerns about the RFS also are gaining traction in Congress. Republicans and Democrats on the US House of Representatives' Energy and Commerce Committee yesterday launched a review of the standard and issued a white paper to solicit comment on blend wall concerns.

The RFS rules have helped bolster imports of sugarcane-based ethanol from Brazil, which could continue to grow as a result of California's Low-Carbon Fuel Standard (LCFS) which classifies the cane-based fuel as advanced. But Brazil's industry does not

appear to be gearing up for more biofuel production, according to Amyris senior vice-president Joel Velasco, despite a lot of talk about how planters are trying to meet growing domestic demand in the country and the potential for greater exports to the US.

Velasco said he expects Brazil to export about 600mn USG to the US this year largely because of Brazil's artificial capping of domestic gasoline prices.

Argentinian biodiesel producers target US market

Argentina's large biodiesel producers are waiting on US Environmental Protection Agency (EPA) approval of their proposal for a certification plan that would give the country's soybean-based biofuel an opportunity to compete in the US market.

Expectations for the move are high because Argentina's biodiesel sector is mired in uncertainty amid plunging exports because of ongoing anti-subsidy and anti-dumping investigations in the EU that essentially have cut off access to the product's main market.

Although Argentina already exports biodiesel to the US, the use of the product is limited as a replacement for heating oil, a tough sell considering there are cheaper alternatives.

Yet if the EPA determines importers of Argentinian biodiesel can use it to generate Renewable Identification Numbers (RIN), which are essential to fulfilling the country's biofuel blending mandate, it could compete with US biodiesel, "and we expect we could be more efficient," one biodiesel executive said.

For Argentina's biodiesel to be able to generate RINs, the

biodiesel plant must be certified by the EPA, a requirement that all of Argentina's large plants already fulfill. Yet the soybean oil feedstock also has to be certified, meaning the producer must fulfill a series of requirements that start from the soybean field itself — ensuring, for example, that no child labor is used across the production chain.

Argentina's biodiesel chamber Carbio, which represents all the large, export-dependent producers, has proposed a certification process to the EPA involving a tracking system that would "trace a soybean through the production chain," an industry executive said.

Biodiesel producers are expecting a response from the EPA by mid-2013. If approved, the US market could help Argentinian producers partially make up for a plunge in European exports following a European Commission measure that effectively allows any anti-dumping and anti-subsidies penalties to be applied retroactively, a move that is scaring off buyers.

Argentina's biodiesel exports plunged by 71pc in February to 45,000t from 155,742t in the same month last year. In January, exports declined by 21pc to 107,250t from 135,607t on the year. That continues a trend seen in the fourth quarter of 2012, when exports fell by 54pc to 221,775t from 481,785t in the same period of 2011.

Small and medium-sized biodiesel producers had threatened to stop delivering to refiners in March, saying the current price and

overall uncertainty was making their business unsustainable. That threat led to some guarded optimism from larger integrated biodiesel companies that they could make up some of the drop in exports by supplying a greater share of the domestic market.

But before the smaller plants could make good on their threat, the Energy Secretariat published new domestic prices for biodiesel, making it possible for the companies to remain in operation. The prices are supposed to be set every 15 days, but the government had not published prices for the January-March period, leading to widespread uncertainty.

On 1 March, Carlos Paredes, the head of the Cepbreb chamber that represents small and medium-sized producers, said that for the business to be viable, the domestic price should increase by around 400 pesos/t (\$79/t), which would have taken it to 5,414 pesos/t for medium-sized companies with an output of as much as 100,000t/yr. That is essentially what the companies received.

For the second half of February, the Energy Secretariat set the domestic price of biodiesel at 5,426 pesos/t for medium-sized companies, 5,484 pesos/t for small companies and 4,660 pesos/t for large companies.

The biodiesel industry is pushing the Argentinian government to increase the country's 7pc blending mandate to make up for the loss of sales abroad. A 10pc blending mandate was supposed to take effect gradually in 2012, but the assorted challenges affecting the sector caused the target to be dashed.

Price Assessment Methodology

Argus US biofuels prices represent the market over the course of the entire trading day. Argus believes that a fair and representative price will include trade throughout the day. For biofuels in the US, Argus publishes the low and the high of deals done. In illiquid markets, Argus looks to assess the range within which product could have traded, based on bids and offers through the day, movements in similar grades, and a market consensus following extensive polling of participants. The Argus assessment is an intelligent range of trade not a mechanistic system.

Price assessments in Argus US Ethanol rely on a wide variety of sources for information, including discussion with refiners, marketers, importers, traders and brokers. Argus works to verify all deal prices, counterparties, and volumes. Argus values transparency, so we publish as much price, volume, and specification information as we discover. This allows you to cross check and verify the deals against the published prices.

The details of our methodology are available at www.argusmedia.com or by calling any Argus office.



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To: Larry Schafer (b) (6)
From: Argyropoulos, Paul
Sent: Tue 12/17/2013 4:51:45 PM
Subject: RE: Invite to Attend the NBB - 11th annual National Biodiesel Conference & Expo

Hey,

We haven't discussed yet but we will.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Larry Schafer [mailto:(b) (6)]
Sent: Thursday, December 12, 2013 3:47 PM
To: Grundler, Christopher; Argyropoulos, Paul
Cc: Anne Steckel; Lindsay Fitzgerald
Subject: Invite to Attend the NBB - 11th annual National Biodiesel Conference & Expo

Chris and Paul:

It was good to see you again yesterday at the EPW hearing.

In January we host nearly 1500 participants at our annual conference. **We invite you to join us for a Panel Discussion about the many issues on which is EPA is working that has a direct impact on the biodiesel sector.**

Including:

- the 2014 RVO;
- the QAP Rule
- the RFS Pathways II and Technical Corrections proposal
- the NODA on Palm
- biodiesel from Argentina and Indonesia; and
- other issues of note.

What is it: NBB - 11th annual National Biodiesel Conference & Expo

San Diego Convention Center
111 W. Harbor Dr.
San Diego, CA 92101

When is it: January 20 – 23

The Panel:

Title: Ask the EPA

Wednesday, January 22

3:30 – 4:30 pm

Overview: Curious about future RFS volumes? Wondering about pathways for new feedstocks? Have a question on imports from Asia or South America? Come hear directly from Environmental Protection Agency experts about these pivotal questions as you plan for another year of biodiesel production.

Moderator: Larry Schafer, National Biodiesel Board, Senior Advisor

Panelist: Chris Grundler, Director, EPA Office of Transportation and Air Quality

Paul Argyropoulos, Senior Policy Advisor, EPA Office of Transportation and Air Quality

Thank you so much. Please consider this invite and I will be back in touch with you both soon.

Larry Schafer

National Biodiesel Board

O: (b) (6)

M: (b) (6)

(b) (6)

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Suite 505

Washington DC 20004

To: Argyropoulos, Paul (b) (6)
From: Larry Schafer
Sent: Fri 11/15/2013 7:07:13 PM
Subject: RE: 2014 Renewable Fuel Standard Proposed Rule

1.28 ...

Larry Schafer

National Biodiesel Board

O: (b) (6)

M: (b) (6)

(b) (6)

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Suite 505

Washington DC 20004

From: Argyropoulos, Paul [mailto:(b) (6)]
Sent: Friday, November 15, 2013 2:07 PM
To: Larry Schafer
Subject: RE: 2014 Renewable Fuel Standard Proposed Rule

Just 1?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: argyropoulos (b) (6)

Web: www.epa.gov

From: Larry Schafer [mailto:(b) (6)]
Sent: Friday, November 15, 2013 2:06 PM
To: Argyropoulos, Paul
Subject: RE: 2014 Renewable Fuel Standard Proposed Rule

Thanks Paul ...

Happy Friday ...

I need a drink!

Larry Schafer

National Biodiesel Board

O: (b) (6)

M: (b) (6)

(b) (6)

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1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

From: Argyropoulos, Paul [mailto:(b) (6)]
Sent: Friday, November 15, 2013 2:04 PM
To: Undisclosed recipients:
Subject: 2014 Renewable Fuel Standard Proposed Rule

Dear Interested Parties

EPA Proposes 2014 Renewable Fuel Standards, 2015 Biomass-Based Diesel Volume

Today’s regulatory action proposes to establish the annual percentage standards for the 2014 National Renewable Fuel Standard Program. This proposal seeks to put the RFS program on a steady path forward – ensuring the continued growth of renewable fuels while recognizing the practical limits on ethanol blending, called the ethanol “blend wall.” EPA is proposing to use existing authorities under the law – to reduce the advanced biofuel and total renewable fuel standards for 2014. The Agency is also proposing to maintain the same volume for biomass-based diesel for 2014 and 2015 as was adopted for 2013. Once the proposal is published in the *Federal Register*, it will be open for a 60 day public comment period.

The proposal discusses a variety of approaches for setting the 2014 standards, and includes a number of production and consumption ranges for key categories of biofuel covered by the RFS program. The proposal seeks comment on a range of total renewable fuel volumes for 2014, covering both ethanol and non-ethanol fuels, and proposes a level within that range for total

renewable fuel at 15.21 billion gallons. For advanced biofuel, EPA proposes to reduce the statutory volume to the sum of the cellulosic volume, the biomass-based diesel requirement, and the additional non-ethanol advanced biofuels that could reasonably be expected to be available and consumed, at a level of 2.20 billion gallons.

The proposed standards reflect EPA's updated production projections, which are informed by extensive engagement with industry and a thorough assessment of the biofuels market. Proposing this reduction from the statutory levels is intended to put the program on a manageable trajectory while still allowing for growth in advanced and total renewable fuels over time. There are two different authorities in the statute that permit EPA to reduce volumes of advanced biofuel and total renewable fuel below the volumes specified in the statute. The proposal covers these authorities and the application of these authorities in setting the 2014 standards.

EPA has also received several requests from regulated parties to partially waive the statutory volumes for 2014 and set them below the volumes specified in the statute. In a separate action, the Agency is seeking comment on these petitions for a waiver of the renewable fuel standards that would apply in 2014. EPA expects that a determination on the substance of the petitions will be issued at the same time that EPA issues a final rule establishing the 2014 RFS standards.

Proposed 2014 Ranges and Volumes Tables

The projected 2014 volumes used to determine the proposed percentage standards are shown in Table 1.

Table 1

Volumes Used to Determine the Proposed 2014 Percentage Standards

Category	Volumes	Range
Cellulosic biofuel	17 mill gal	8-30 million gallons
Biomass-based diesel	1.28 bill gal	1.28 billion gallons ^b
Advanced biofuel	2.20 bill gal	2.0-2.51 billion gallons

Renewable fuel 15.21 bill gal 15.00-15.52 billion gallons

^aAll volumes are ethanol-equivalent, except for biomass-based diesel which is actual

^bEPA is requesting comment on alternative approaches and higher volumes

Four separate percentage standards corresponding to the four separate volume requirements shown in Table 1. The percentage standards represent the ratio of renewable fuel volume to non-renewable gasoline and diesel volume. Thus, in 2014 about 10% of all fuel used would be from renewable sources. The proposed standards for 2014 are shown in Table 2.

Table 2

Proposed Percentage Standards for 2014

Cellulosic biofuel	0.010 percent
Biomass-based diesel	1.16 percent
Advanced biofuel	1.33 percent
Total renewable fuels	9.20 percent

For more information on this proposal, please visit the RFS website at:

www.epa.gov/otaq/fuels/renewablefuels

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

To: Argyropoulos, Paul (b) (6)
From: BIO Newsletter
Sent: Thur 12/12/2013 9:42:15 PM
Subject: BIO Newsletter: December 12, 2013

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12.12.2013

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FOOD AND AGRICULTURE

Data Use and Compensation Agreement

BIO and the American Seed Trade Association announced that the Data Use and Compensation Agreement is open for signature. This announcement marks the culmination of BIO and ASTA's work on the AgAccord®, a voluntary private sector mechanism to support a seamless transition to a marketplace that includes both proprietary and off-patent biotechnology events...

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PUBLIC POLICY

FDA Drug Development and Manufacturing Challenges

Paul Hastings, Chairman and Chief Executive Officer of California-based OncoMed Pharmaceuticals, testified at a Congressional hearing that while positive indicators demonstrate the biopharma industry is rebounding, but significant challenges remain...

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2013 BIO Pacific Rim Summit

Pacific Rim Summit on Industrial Biotechnology and Bioenergy

On Monday, BIO kicked off its Pacific Rim Summit with five track sessions showcasing the latest innovative

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BIO Joins Partners for Healthy Dialogues

BIO and our members support transparency in the life science industry and in the relationships between industry and physicians. We also strongly believe in the value of such relationships for the patients we commit together to serve.




Accordingly...

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RENEWABLE FUEL STANDARD

EPA's RFS Proposal Will Undercut Development of Advanced and Cellulosic Biofuels

BIO's testimony to the EPA public hearing for the 2014 RFS volumes highlighted the jobs, investments and environmental benefits that will be lost if biofuel volumes are rolled back...

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EMERGING COMPANY POLICY

Emerging Company Policy Deconstructed: Start-up Jobs and Innovation Act (S. 1658)




Senators Robert Menendez (D-NJ) and Pat Toomey (R-PA) introduced the Start-up Jobs and Innovation Act to spur capital formation for R&D-focused companies in the early stages of development...

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HIV/AIDS

World AIDS Day: Act Aware



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
Obama Launches Initiative Aimed at Curing HIV

The Obama administration announced that it is shifting \$100 million into research efforts aimed at curing HIV...

VACCINES  

Children in Philippines Receive Vaccines Against Measles, Polio



The Government of the Philippines with support from UNICEF, the World Health Organization, and other partners recently announced a mass campaign to vaccinate more than 30,000 children against measles and polio in typhoon-hit Tacloban...

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EMERGING COMPANY POLICY

Emerging Company Policy Deconstructed: Small Cap Liquidity Reform Act (H.R. 3448)

This bill, sponsored by Reps. Sean Duffy and John Carney, will spur capital formation by increasing liquidity for emerging growth companies, including biotech innovators, that trade on the public market...

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Canada Surpasses the US in the Approval of AquaBounty GM Salmon Eggs

Genetically engineered animals can help transform innovative therapies that can be used to improve both human and animal health...

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BUSINESS AND INVESTMENTS

NYC Launches \$100M Life Science Fund

Deputy Mayor Robert Steel announced that the city is launching the New York City Emerging Life Science Technology Investment Fund, a \$100 million venture fund for life sciences research...

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Biotech Stocks Hit Record Highs...Again

Biotech stocks hit an all-time high, driven by strong performance among large cap sector leaders with strong product portfolios...

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2014 BIO INTERNATIONAL CONVENTION

Kick-Off Planning for San Diego Convention

The BIO 2014 International Convention in San Diego is just around the corner. With that in mind, we kicked planning efforts into high gear the week before

Thanksgiving...

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INNOVATION ACT

scribble

Innovation Act Passed By House



BIO does not support the bill in its current form, which would ultimately undermine biotech research and innovation by making it more difficult for patent holders with legitimate claims to protect their intellectual property...

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The Value of Partnering Continues to be a Draw for BIO Events

While 700 partnering meetings is impressive, this coming February's BIO CEO & Investor Conference in New York City expects nearly double that amount...

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DRUG QUALITY AND SECURITY ACT

National Traceability System Moves into Implementation

President Obama signed into law the Drug Quality and Security Act (H.R. 3204), which created a single, uniform and national solution to safeguard the nation's pharmaceutical supply chain against criminal counterfeiting...

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National Traceability System Moves into Implementation



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Flu Wee Vaccination

The National Vaccine Injury Compensation Program established a new holiday season for people to get their flu shots...




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VACCINES



Flu Week: It's Not Too Late to Vaccinate

The National Influenza Vaccination Week, established by the CDC to encourage people to get vaccinated as we enter the holiday season...

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INNOVATION ACT

Emerging Deconstruction Innovation

Representative
introduced the
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BAYBIO LIFETIME ACHIEVEMENT DINA AWARD

BIO President & CEO Presents Dr. Cohen With Lifetime Achievement Award

Jim Greenwood, President & CEO of the Biotechnology Industry presented Dr. Stanley N. Cohen with the BayBio Lifetime Achievement DiNA Award for his contributions to making a transformative difference within the life science industry...



INNOVATION ACT

INNOVATION ACT



INNOVATION ACT

Emerging Company Policy Deconstructed: Fostering Emerging




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Innovation Act (H.R. 2629)

Representative Michael Fitzpatrick (R-PA) introduced H.R. 2629, the Fostering
Innovation Act.
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Admitted speaker?



02.10.14

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**World Congress on Industrial
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Over the past nine years, BIO's
semiannual IP Counsels Committee
Conference has become a prominent
event in the world's largest IP
industrial biotechnology event for
business leaders, investors, and policy
makers in biotech, biobased products,
and renewable chemicals...

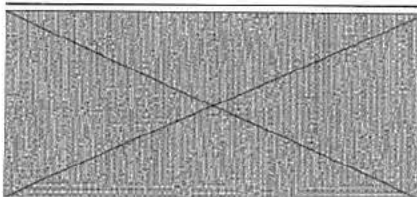
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biotechnology...

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Senior Scientist, Pfizer

Groton, Connecticut, United States - Dec 3,
2013

**Associate Director,
Formulation Development,
MacroGenics**

Rockville, Maryland, United States - Dec 4,
2013

**Clinical Trials Manager,
Multiple Myeloma Research
Foundation**

Norwalk, Connecticut, United States - Nov 18,
2013

Scientist/ Associate Scientist,
POST A BIOTECHNOLOGY JOB >

Assistant/Associate

Professor, Biomedical

Engineering, University of

Iowa College of Engineering

Iowa City, Iowa, United States - Dec 10, 2013

Those smarties at Johns Hopkins have identified a gene that builds the circuitry that relays signals through the brain. That actually has direct impact on better understanding the aging brain. How incredible is that?

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To: Bittleman, Sarah (b) (6) Argyropoulos,
Paul (b) (6) Reed, Valerie (b) (6) Campbell, Todd -
(b) (6)
From: Brent Erickson
Sent: Tue 10/29/2013 1:16:51 PM
Subject: AEC, BIO Urge White House to Not Reduce 2014 RFS Numbers

2013-10-29 09:12:16 EDT

*****AEC, BIO Urge White House to Not Reduce 2014 RFS Numbers**

Two trade groups representing more than 35 advanced biofuel companies are urging the administration not to reduce requirements for the upcoming 2014 Renewable Fuel Standard (RFS) proposal.

"[W]e are writing to express our concern about a recently released draft of the proposed 2014 RFS volumetric blending requirement. While the official proposed rule has not been released, it is clear that a number of key issues are under consideration at the present time," wrote the Advanced Ethanol Council (AEC) and the Biotechnology Industry Organization (BIO) in a joint letter sent today to President Obama.

As OPIS reported earlier this month, the recently leaked draft, while not an official release from EPA, noted that just 13 billion gal/yr of conventional biofuel (mostly comprised of corn-based ethanol) would be required in 2014 (down from 14.4 billion gal as originally envisioned), the advanced biofuel requirement would be set at 2.21 billion gal (down from 2.75 billion gal as originally envisioned), the cellulosic biofuel target would be set at 23 million gal (well below the 1.75 billion gal as originally envisioned) and the biomass-based diesel target would be held steady at 1.28 billion gal.

"As a general matter, we are highly aware of the pressure the administration and Congress are under with regard to the RFS," the letter explained. "But the RFS is only recently pushing the oil industry out of its comfort zone with regard to the amount of renewable fuel utilized in the marketplace and the types of advanced fuels beginning to come online from new sectors. Depressurizing the program too aggressively at this critical juncture will only make the deployment of advanced biofuels more challenging by embedding willful non-compliance as a construct for discouraging innovation, blocking the availability of cheaper fuels and increasing pump prices and undercutting billions of dollars in investment in advanced biofuels," it noted.

In the letter, AEC and BIO outlined several specific concerns:

-- "Broadly speaking, we support the data-driven approach used to date by EPA.

It is clear that the best outcome for the RFS is to base the annual RVOs [renewable volume obligations] on immediate term forecasts of actual expected output in the coming year. We expect to meet the 2013 RVO for advanced biofuels of 2.75 billion gallons. We are aware that the oil industry would like to base the RFS on gallons produced to date. Allowing the RFS to reflect, rather than drive the marketplace is a problem because the oil industry controls off-take of our fuel, which in turn gives them unreasonable leverage to determine themselves how quickly our industry grows. This challenge, stemming largely from the lack of competition and market access in the motor fuel marketplace, is the problem that the RFS is designed to remedy in its forward-looking design;

--The RFS must maintain pressure on the marketplace in order to work. The controversy over the RFS boils down to a market share battle between a growing biofuels industry and the incumbent oil industry. In essence, the oil industry wants EPA/OMB to make administrative adjustments to the RFS that will greatly reduce or eliminate the drivers that facilitate more biofuel blending over time, which will ultimately lead to price competition between the two industries at the fuel pump. The key driver is RIN prices, and the focal point of the oil industry's attempt to paralyze the RFS at the administrative level is the miscasting of RIN prices relative to the so-called blendwall and gas prices. ...

The RFS is actually well engineered to address the blendwall on its own, without consumer cost. ... Softening the RFS in any way to address the blendwall will actually perpetuate the blendwall as a construct to dampen innovation and competition, which will cost consumers at the pump and undercut innovation in the sector; and

-- Giving too much credence to factually incorrect claims about constraints on consumption will have a number of serious unintended consequences. As discussed, the RFS is engineered to address challenges like the oil industry's historic and current refusal to blend more renewable fuels. ... As such, any perceived unwillingness on the part of RFS administrators to allow the program to work would send a clear signal to the advanced biofuel marketplace that the RFS may not be allowed to change market behavior as promised. This mere possibility increases investment risk, which in turn drives capital away from the U.S.

market and decreases the effective deployment of advanced biofuels."

"We encourage OMB/EPA to recognize that even a proposed rule is a market signal, and

that many of the alleged problems with the RFS are actually signs that the RFS is working as designed," the letter concluded.

Among the groups which signed the letter were Abengoa Bioenergy, Chemtex, Coskata, DuPont, Enerkem, Gevo, Iogen, Novozymes, POET and Solazyme.

Additionally, similar letters were sent to the administration last week by Fuels America and the National Biodiesel Board.

Meanwhile, representatives from both AEC and BIO also met last week with the White House's Office of Management and Budget to discuss EPA's pending 2014 RFS proposal.

--Rachel Gantz, (b) (6)

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To: Lindsay Fitzgerald (b) (6)
From: Argyropoulos, Paul
Sent: Wed 3/26/2014 4:50:13 PM
Subject: RE: good times...

Oh boy.....

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Lindsay Fitzgerald [mailto:(b) (6)]
Sent: Wednesday, March 26, 2014 12:29 PM
To: Argyropoulos, Paul
Subject: good times...

<http://thegazette.com/2013/10/04/future-murky-at-waste-to-energy-plants-in-hopkinton-cedar-rapids/>

Lindsay Fitzgerald

Director, Regulatory Affairs

National Biodiesel Board

O: (b) (6)

C (b) (6)

(b) (6)

www.biodiesel.org

To: Michael.McAdams (b) (6) (b) (6)
From: Argyropoulos, Paul
Sent: Fri 3/21/2014 5:05:10 PM
Subject: Re: Couple questions.

Planted trees aren't approved for anything yet and until they are they can't be used as a feedstock. Gasification of approved biomass like tree residues and pre commercial things is approved as are any processes. We can do a call in number but can you remind me the day and time of the meeting?

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Mobile: (b) (6)

For our meeting next week if some of my companies can not make it in person can we arrange so they can call in?

Second looking in some of the approved pathways for gasification I noticed that planted trees are not mentioned in the feedstock boxes. Does it have to be added by petition or could it be done in the pathways two rule. Thanks

Look forward to seeing you next week.

Sent using BlackBerry

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To: Michael.McAdams (b) (6) (b) (6) Stewart,
Gwen[Stewart.Gwen@epa.gov]
Cc: gjohnston (b) (6) (b) (6)
From: Argyropoulos, Paul
Sent: Tue 3/11/2014 7:36:49 PM
Subject: RE: intermediate feedstock considerations

Hi Mike,

I'm copying Gwen to assist with determining Chris's availability and any necessary follow-up in coordination of a meeting.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Michael.McAdams (b) (6) (mailto:(b) (6))
Sent: Tuesday, March 11, 2014 2:07 PM
To: Argyropoulos, Paul
Cc: gjohnston (b) (6)
Subject: intermediate feedstock considerations

Paul: As we have previously discussed a number of the ABFA members are concerned that rule

dealing with intermediate feedstock could pose unintended negative consequences. We are extremely supportive of the QAPS process and believe that answers to some of these concerns may actually lie within QAPS process. For this reason we would request a meeting with the appropriate team at EPA including Mr. Grundler, Bunker, Simon, Machiele, yourself. On the ABFA side we are attempting to limit the meeting to a representative of each type of potentially impacted process, Algae oil, Hydro processing, synthetic biology, pyrolysis, etc.

We had originally discussed the week of March 24, but I am certain our folks would be as prepared to fly to Ann Arbor as to DC. Could you please inquire whether the 26th and 27th of March would present an appropriate time for a conversation. I have attached our earlier brief to EPA for further review. Thank you for your consideration.

Michael McAdams | Holland & Knight

President, ABFA
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) | Fax (b) (6)
(b) (6) | www.hklaw.com

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To: Michael.McAdams (b) (6) (b) (6)
From: Argyropoulos, Paul
Sent: Tue 3/11/2014 4:20:13 PM
Subject: RE: Intermediate feedstock discussion

Up to you. Happy to start with us if you think that's the next logical step. Not sure if that advances the ball but we can affirm with Chris your / the industry's interest and then see what the next steps are.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Michael.McAdams (b) (6) [mailto:(b) (6)]
Sent: Tuesday, March 11, 2014 12:18 PM
To: Argyropoulos, Paul
Subject: Re: Intermediate feedstock discussion

I was thinking you karl and byron. Shouls I ask sor chris. Just as easy to go to ann arbour for most of these guys.

Sent using BlackBerry

From: Argyropoulos, Paul [mailto:(b) (6)]
Sent: Tuesday, March 11, 2014 12:10 PM Eastern Standard Time
To: McAdams, Michael J (b) (6)
Subject: RE: Intermediate feedstock discussion

Hi Mike,

You are still interested in meeting with Chris, correct? Chris is scheduled to be in Ann Arbor that week so if you wanted a face to face, you'd need to go there. Otherwise we'd need to look at different options.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Michael.McAdams (b) (6) [mailto:(b) (6)]

Sent: Tuesday, March 11, 2014 9:59 AM

To: Argyropoulos, Paul

Subject: Intermediate feedstock discussion

Paul : We are having a pre call on the issue brief we sent you all in December. I am looking at the week of March 24th and wanted to check whether we could make the meeting either the 26th or 27th. I am suspecting we will have at least 5 impacted companies who will fly to DC to participate. Your thoughts, thanks.

I saw the new pathway piece, glad to see the ball keep rolling down hill. All the best,

Michael McAdams | Holland & Knight

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800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) | Fax (b) (6)
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[Add to address book](#) | [View professional biography](#)

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To: Michael.McAdams (b) (6) (b) (6)
From: Argyropoulos, Paul
Sent: Tue 3/11/2014 4:10:33 PM
Subject: RE: Intermediate feedstock discussion

Hi Mike,

You are still interested in meeting with Chris, correct? Chris is scheduled to be in Ann Arbor that week so if you wanted a face to face, you'd need to go there. Otherwise we'd need to look at different options.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Michael.McAdams (b) (6) [mailto:(b) (6)]
Sent: Tuesday, March 11, 2014 9:59 AM
To: Argyropoulos, Paul
Subject: Intermediate feedstock discussion

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I saw the new pathway piece, glad to see the ball keep rolling down hill. All the best,

Michael McAdams | Holland & Knight

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To: Larry Schafer (b) (6)
From: Argyropoulos, Paul
Sent: Tue 3/11/2014 12:49:17 PM
Subject: RE: Any break s in your schedule this week?

OK

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Larry Schafer [mailto:(b) (6)]
Sent: Tuesday, March 11, 2014 8:38 AM
To: Argyropoulos, Paul
Subject: RE: Any break s in your schedule this week?

I am at my desk ... will head to Marriott at 9 ...

Larry Schafer

National Biodiesel Board

O: (b) (6)

M: (b) (6)

(b) (6)

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www.americasadvancedbiofuel.com

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

From: Argyropoulos, Paul [mailto:(b) (6)]
Sent: Monday, March 10, 2014 3:04 PM
To: Larry Schafer
Subject: RE: Any break s in your schedule this week?

9ish

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Larry Schafer [mailto:(b) (6)]
Sent: Monday, March 10, 2014 2:58 PM

To: Argyropoulos, Paul
Subject: RE: Any break s in your schedule this week?

I am open what time works for u.

Larry Schafer

t: (b) (6)

On Mar 10, 2014 2:22 PM, "Argyropoulos, Paul" <(b) (6)> wrote:

Tomorrow morning.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Larry Schafer [mailto:(b) (6)]
Sent: Monday, March 10, 2014 1:17 PM
To: Argyropoulos, Paul
Subject: Any break s in your schedule this week?

Larry Schafer

t: (b) (6)

=====

From: Argyropoulos, Paul
Location: Conference Call
Importance: Normal
Subject: Accepted: Call with Delane Richardson of Chemtex and Paul Argyropoulos of EPA re: biofuel feedstock questions
Start Date/Time: Thur 3/6/2014 4:00:00 PM
End Date/Time: Thur 3/6/2014 4:30:00 PM

To: Jonathan (b) (6)
From: Argyropoulos, Paul
Sent: Tue 3/4/2014 6:01:12 PM
Subject: RE: Sorghum pathway and woodchips

Jonathan,

The only time available is 11 to 11:30. If that works, put a temporary hold on the calendar. If not, we'll have to push to a later date. Given the weather, a lot of our schedules have been compressed and the 2 people I'd like on the call have very limited availability.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Jonathan Birdsong [mailto:(b) (6)]
Sent: Tuesday, March 04, 2014 11:37 AM
To: Argyropoulos, Paul
Subject: Re: Sorghum pathway and woodchips

Checking in on the potential for a call on Thursday.

Thanks,

Jonathan Birdsong

BlueWater Strategies

400 North Capitol St., NW - Suite 475

Washington, DC 20001

(b) (6) - Direct

(b) (6) - Cell

(b) (6)

On Mar 1, 2014, at 8:20 AM, "Jonathan Birdsong" <(b) (6)> wrote:

Paul -

Thanks so much for your time on Wednesday. If you and your team have time for a call on Thursday, March 6th at 1:00 p.m. EST to have a call with Chemtex, that would be great.

Again, thanks for everything and I look forward to hearing if this time works for you and your team.

Jonathan

From: Argyropoulos, Paul [(b) (6)]
Sent: Tuesday, February 25, 2014 3:51 PM
To: Jonathan Birdsong
Subject: RE: Sorghum pathway and woodchips

Hi Jonathan. I checked with some other key people on our team and unfortunately, we are slammed. You and I can chat tomorrow (how about the morning) on the other questions and then we can look for a time to get on the phone with the Chemtex people sometime next week.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Jonathan Birdsong [mailto:(b) (6)]
Sent: Monday, February 24, 2014 10:49 AM
To: Argyropoulos, Paul
Subject: RE: Sorghum pathway and woodchips

Hi Paul –

Just checking to see if the times proposed below work for you. If not, let's be sure to schedule some time for a call.

Thanks!

Jonathan

From: Jonathan Birdsong
Sent: Friday, February 21, 2014 5:24 PM
To: Argyropoulos, Paul
Cc: Bittleman, Sarah; Grundler, Christopher
Subject: Re: Sorghum pathway and woodchips

Paul -

An executive from Chemtex will be in town next week. Perhaps we could meet you in your office Wednesday afternoon or Thursday morning to discuss in person? Let me know if that would work for you.

Again, thanks!

Jonathan Birdsong

BlueWater Strategies

400 North Capitol St., NW - Suite 475

Washington, DC 20001

(b) (6) - Direct

(b) (6) - Cell

(b) (6)

On Feb 21, 2014, at 2:47 PM, "Argyropoulos, Paul" <Argyropoulos.(b) (6)> wrote:

Hi Jonathan.

Why don't you give me a ring next week. I'll give you as much direction as possible.

Thanks, Paul.

From: Jonathan Birdsong <(b) (6)>
Sent: Friday, February 21, 2014 11:29:07 AM
To: Bittleman, Sarah; Argyropoulos, Paul; Grundler, Christopher
Subject: Sorghum pathway and woodchips

Sarah, Paul and Chris –

I have a few questions for you that I hope you can answer, or point me in the right direction. We want to be helpful.

1. Where in the process is the review/approval of biomass sorghum as an advanced biofuel?

As you know, in August 2013, a federal register notice was issued (FR notice can be found [here](#), and mention of sorghum is on page 24 of the PDF) which highlighted that EPA was examining new pathways for biomass sorghum, yet EPA has not yet determined, either through rulemaking or approval of an industry petition, a pathway is valid for the generation for advanced biofuel RINs.

Any insight on where the review of the pathway is in the process, or how we can help, would be appreciated.

2. We are a bit confused as to whether the chips of non-merchantable trees from tree plantations are eligible for RIN's. Species of particular interest include red maple, sweet gum and poplar.

It seems that [Mascoma Corporation/Frontier Resources](#) has an agreement with the EPA to use non-merchantable hardwood pulpwood as a part of their biofuel feedstock, and we're curious if a similar agreement is applicable in this instance.

3. [RFS2](#) has a clear definition of "tree plantations." However, we cannot find a clear definition of "non-federal forestland." We've looked all over the USDA/Forest Service sites as well as EPA rules, but have yet to find a clear definition. We believe that it means non-plantation forests that are not part of the federal system (read: private forest land in the west, state forest land, etc.), but these lands are typically replanted after harvest, not dissimilar to a tree plantation. Clarification on this would be greatly beneficial.

Thanks so much for your time and assistance. Please call anytime with any questions/comments.

Sincerely,

Jonathan Birdsong

(b) (6) - Cell

(b) (6) Office Direct

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the EPA network. EPA is deleting all computer program attachments sent
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containing the renamed attachment, you can rename the file extension to
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Center at (866) 411-4EPA (4372). The TDD number is (866) 489-
4900. ***** ATTACHMENT NOT DELIVERED

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Version: 2014.0.4335 / Virus Database: 3705/7120 - Release Date: 02/24/14

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Checked by AVG - www.avg.com

Version: 2014.0.4335 / Virus Database: 3705/7120 - Release Date: 02/24/14

To: Tom Buis (b) (6)
From: Argyropoulos, Paul
Sent: Mon 3/3/2014 2:12:17 PM
Subject: FW: Media Advisory: TODAY: Press Conference Call with EPA Administrator on Cleaner Fuels and Cars Standards Announcement

Per my voicemail.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: U.S. EPA (mailto:(b) (6))
Sent: Monday, March 03, 2014 9:03 AM
To: Argyropoulos, Paul
Subject: Media Advisory: TODAY: Press Conference Call with EPA Administrator on Cleaner Fuels and Cars Standards Announcement

CONTACT:
Julia P. Valentine (NEWS MEDIA ONLY)
valentine.julia@epa.gov
202-564-0496
202-779-0084

FOR IMMEDIATE RELEASE
March 3, 2014

TODAY: Press Conference Call with EPA Administrator on Cleaner Fuels and Cars Standards Announcement

WASHINGTON – The U.S. Environmental Protection Agency (EPA) Administrator Gina McCarthy will hold a press conference call on Monday, March 3 at 10:00 a.m. EST to discuss the Tier 3 Motor Vehicle Emission and Fuel Standards.

Members of the media interested in participating should dial in ten minutes prior to the beginning of the call at (877) 851 0679 and give the conference ID number 7189038. The name of the call is the Tier 3 Motor Vehicle Emission and Fuel Standards Announcement.

WHO:

- U.S. Environmental Protection Agency Administrator Gina McCarthy
- Mike Robinson, Vice President, Sustainability and Global Regulatory Affairs, General Motors Company
- George (Tad) S. Abum, Jr., Co-President, National Association of Clean Air Agencies (NACAA), and Director, Maryland Department of the Environment – Air and Radiation Management Administration
- Harold P. Wimmer, National President and CEO, American Lung Association

WHAT: Press conference call regarding Tier 3 Motor Vehicle Emission and Fuel Standards.

WHEN: Monday, March 3 at 10:00 a.m. EST


HOW: Members of the media interested in participating should dial in ten minutes prior to the beginning of the call at (877) 851 0679

Conference ID: 7189038.

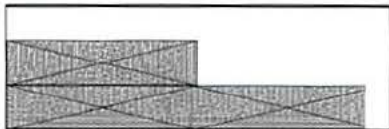
Conference Name: Tier 3 Motor Vehicle Emission and Fuel Standards

*****THIS CALL IS FOR CREDENTIALLED NEWS MEDIA ONLY*****

R047

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This email was sent to argyropoulos.paul@epa.gov using GovDelivery, on behalf of: U.S. Environmental Protection Agency · 1200 Pennsylvania Avenue NW · Washington DC 20460 · 202-564-4355



To: Larry Schafer (b) (6)
From: Argyropoulos, Paul
Sent: Thur 2/27/2014 8:05:45 PM
Subject: RE: Any thoughts on today s meeting?

I thought the meeting went well. As Janet noted, we have a lot to work through, with lots of different perspectives, lots of data and tons of comments. Your info is certainly a useful part of the record and it was good for you to meet with her and have a direct productive dialog. We all want to come up with the best, highest defensible result.

BTW, thanks for the extra copy.....

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Ischafer (b) (6) [mailto:(b) (6)] On Behalf Of Larry Schafer
Sent: Thursday, February 27, 2014 12:19 PM
To: Argyropoulos, Paul
Subject: Any thoughts on today s meeting?

=====
Larry Schafer

t: (b) (6)

=====

To: Larry Schafer (b) (6)
From: Argyropoulos, Paul
Sent: Wed 2/26/2014 8:50:31 PM
Subject: RE: Biodiesel on Thursday

Thanks Larry. If OK with you, I'll share generally with a couple others here (Chris Ben and Karl Only).

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Larry Schafer [mailto:(b) (6)]
Sent: Wednesday, February 26, 2014 3:17 PM
To: Argyropoulos, Paul
Subject: Biodiesel on Thursday

Paul,

We wanted to give you and your team a heads up -- as part of the meeting with Janet tomorrow -- we will likely ask the following questions:

- What do you think is the most important factor for EPA to address in order to move the biodiesel industry forward -- or in other words, allow us to grow beyond the 1.28 billion gallons?
- Who do we need to talk to or discuss this with in order to address the issues?
- Who at EPA or the Administration needs to be convinced about the value of

biodiesel?

- [REDACTED] What does timing look like?

- [REDACTED] Have you decided or finalized any issues?

- [REDACTED] What are the biggest issues you are trying to address?

- [REDACTED] We believe that biodiesel and the diesel pool can help EPA address a number of volume concerns when it comes to the Advanced Pool – and even for purposes of obligated parties complying with a robust conventional pool – do you view this issue the same way?

- [REDACTED] What information do you need that you do not have?

- [REDACTED] What issues about biodiesel do you need to better understand?

- [REDACTED] Are there aspects of biodiesel that make you uncomfortable with biodiesel as a replacement to diesel fuel?

- [REDACTED] Historical relationship between EPA and the NBB

The cases NBB has intervened in support of EPA are as follows:

- [REDACTED] NPRA v. EPA (2010 RFS2 rule)

- [REDACTED] National Chicken Council v. EPA (2010 RFS2 Rule) (related to the environmental petitioners challenges)

- [REDACTED] API v. EPA (2012 RFS)

- [REDACTED] AFPM v. EPA (2011 RFS)

- [REDACTED] AFPM v. EPA (2013 BBD volume)

If you have any questions, then please let me know.

Thank you.

Larry Schafer

National Biodiesel Board

O: (b) (6)

M: (b) (6)

(b) (6)

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www.americasadvancedbiofuel.com

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

To: Jonathan Birdsong (b) (6)
From: Argyropoulos, Paul
Sent: Tue 2/25/2014 8:51:33 PM
Subject: RE: Sorghum pathway and woodchips

Hi Jonathan. I checked with some other key people on our team and unfortunately, we are slammed. You and I can chat tomorrow (how about the morning) on the other questions and then we can look for a time to get on the phone with the Chemtex people sometime next week.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Jonathan Birdsong [mailto:(b) (6)]
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To: Argyropoulos, Paul
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Cc: Bittleman, Sarah; Grundler, Christopher
Subject: Re: Sorghum pathway and woodchips

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Again, thanks!

Jonathan Birdsong

BlueWater Strategies

400 North Capitol St., NW - Suite 475

Washington, DC 20001

(b) (6) Direct

(b) (6) Cell

(b) (6)

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Hi Jonathan.

Why don't you give me a ring next week. I'll give you as much direction as possible.

Thanks, Paul.

From: Jonathan Birdsong <(b) (6)>
Sent: Friday, February 21, 2014 11:29:07 AM
To: Bittleman, Sarah; Argyropoulos, Paul; Grundler, Christopher
Subject: Sorghum pathway and woodchips

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As you know, in August 2013, a federal register notice was issued (FR notice can be found [here](#), and mention of sorghum is on page 24 of the PDF) which highlighted that EPA was examining new pathways for biomass sorghum, yet EPA has not yet determined, either through rulemaking or approval of an industry petition, a pathway is valid for the generation for advanced biofuel RINs.

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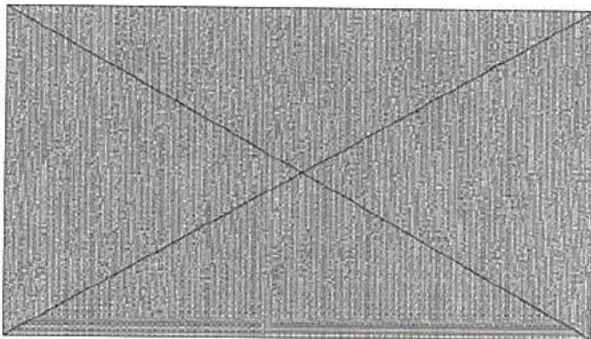
Thanks so much for your time and assistance. Please call anytime with any questions/comments.

Sincerely,

Jonathan Birdsong

(b) (6) - Cell

(b) (6) - Office Direct



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image001.jpg which may be a computer program. This attached computer
program could contain a computer virus which could cause harm to EPA's
computers, network, and data. The attachment has been deleted. This was
done to limit the distribution of computer viruses introduced into the EPA
network. EPA is deleting all computer program attachments sent from the

Internet into the agency via Email. If the message sender is known and the attachment was legitimate, you should contact the sender and request that they rename the file name extension and resend the Email with the renamed attachment. After receiving the revised Email, containing the renamed attachment, you can rename the file extension to its correct name. For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900. *****
ATTACHMENT NOT DELIVERED *****

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2014.0.4335 / Virus Database: 3705/7120 - Release Date: 02/24/14

To: Larry Schafer (b) (6)
From: Argyropoulos, Paul
Sent: Mon 2/24/2014 5:32:01 PM
Subject: RE: Do you have a minute to chat this afternoon?

Now.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Larry Schafer [mailto:(b) (6)]
Sent: Monday, February 24, 2014 12:04 PM
To: Argyropoulos, Paul
Subject: RE: Do you have a minute to chat this afternoon?

I have a 2 and and 4 ...

What works for you?

Larry Schafer

National Biodiesel Board

O: (b) (6)

M: (b) (6)

(b) (6)

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1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

From: Argyropoulos, Paul [mailto:(b) (6)]
Sent: Monday, February 24, 2014 11:44 AM
To: Larry Schafer
Subject: RE: Do you have a minute to chat this afternoon?

Yes.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Larry Schafer [mailto:(b) (6)]
Sent: Monday, February 24, 2014 11:43 AM
To: Argyropoulos, Paul
Subject: Do you have a minute to chat this afternoon?

Larry Schafer

t: (b) (6)

To: Lindsay Fitzgerald (b) (6) Larry Schafer (b) (6)
Cc: Lie, Sharyn (b) (6)
From: Argyropoulos, Paul
Sent: Tue 2/18/2014 1:23:11 PM
Subject: RE: NBB meeting with EPA

Let's use this one:

(b) (6) CODE (b) (6)

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Phone: 202-564-1123
Mobile: 202-577-9354
Email: argyropoulos.paul@epa.gov
Web: www.epa.gov

-----Original Message-----

From: Lindsay Fitzgerald [mailto:(b) (6)]
Sent: Monday, February 17, 2014 3:55 PM
To: Argyropoulos, Paul; Larry Schafer
Subject: Re: NBB meeting with EPA

Paul- can you share a call in with Larry to give to Alan Weber?

Thanks!

Sent from my iPhone

> On Feb 17, 2014, at 3:31 PM, "Argyropoulos, Paul" <(b) (6)> wrote:
>
> Lindsay,
>
> Sorry to hear about your family emergency. I hope everything is OK.
>
> I believe we are all set with the meeting tomorrow. 1 PM. Sharyn has been taking care of the
coordination on this so she has the final word on confirmation but I think everything is all set.
>
> Larry and Anne, call up to either Sharyn or I and we'll send someone down to escort you up.
>
> Thanks, Paul
>
> From: Lindsay Fitzgerald <(b) (6)>
> Sent: Monday, February 17, 2014 3:24:27 PM
> To: Lie, Sharyn; Argyropoulos, Paul; Anne Steckel; Larry Schafer
> Subject: NBB meeting with EPA
>
> Sharyn and Paul-
>
> I will be out of town for the next few days for a family emergency. Can you please confirm with Anne
and Larry about meeting tomorrow (Tuesday 2/18 at 1pm) to discuss the cost of carbon. If that time is no
longer available, we will work with Paul to schedule a new time.
>

> Also, can you please include who to call when the team gets to the security desk.
>
> Thank you!
> Lindsay
>
> Sent from my iPhone

To: Lindsay Fitzgerald (b) (6)
From: Argyropoulos, Paul
Sent: Mon 2/17/2014 9:01:30 PM
Subject: Re: NBB meeting with EPA

So sorry. My condolences to both of you.

From: Lindsay Fitzgerald (b) (6)
Sent: Monday, February 17, 2014 3:37:55 PM
To: Argyropoulos, Paul
Subject: Re: NBB meeting with EPA

Thanks. (b) (6)

L

Sent from my iPhone

> On Feb 17, 2014, at 3:31 PM, "Argyropoulos, Paul" <(b) (6)> wrote:

>

> Lindsay,

>

> (b) (6)

>

> I believe we are all set with the meeting tomorrow. 1 PM. Sharyn has been taking care of the coordination on this so she has the final word on confirmation but I think everything is all set.

>

> Larry and Anne, call up to either Sharyn or I and we'll send someone down to escort you up.

>

> Thanks, Paul

>

> **From:** Lindsay Fitzgerald <(b) (6)>

> **Sent:** Monday, February 17, 2014 3:24:27 PM

> **To:** Lie, Sharyn; Argyropoulos, Paul; Anne Steckel; Larry Schafer

> **Subject:** NBB meeting with EPA

>

> Sharyn and Paul-

>

> (b) (6) Can you please confirm with Anne and Larry about meeting tomorrow (Tuesday 2/18 at 1pm) to discuss the cost of carbon. If that time is no longer available, we will work with Paul to schedule a new time.

>

> Also, can you please include who to call when the team gets to the security desk.

>

> Thank you!

> Lindsay

>

> Sent from my iPhone

To: Lindsay Fitzgerald (b) (6) Lie, Sharyn (b) (6) Anne
Steckel (b) (6) Larry Schafer (b) (6)
From: Argyropoulos, Paul
Sent: Mon 2/17/2014 8:31:22 PM
Subject: Re: NBB meeting with EPA

Lindsay,

(b) (6)

I believe we are all set with the meeting tomorrow. 1 PM. Sharyn has been taking care of the coordination on this so she has the final word on confirmation but I think everything is all set.

Larry and Anne, call up to either Sharyn or I and we'll send someone down to escort you up.

Thanks, Paul

From: Lindsay Fitzgerald <(b) (6)>
Sent: Monday, February 17, 2014 3:24:27 PM
To: Lie, Sharyn; Argyropoulos, Paul; Anne Steckel; Larry Schafer
Subject: NBB meeting with EPA

Sharyn and Paul-

(b) (6). Can you please confirm with Anne and Larry about meeting tomorrow (Tuesday 2/18 at 1pm) to discuss the cost of carbon. If that time is no longer available, we will work with Paul to schedule a new time.

Also, can you please include who to call when the team gets to the security desk.

Thank you!
Lindsay

Sent from my iPhone

To: Larry Schafer (b) (6)
From: Argyropoulos, Paul
Sent: Tue 2/11/2014 11:18:09 PM
Subject: Re: you doing okay?

Yes.

From: Larry Schafer <(b) (6)>
Sent: Tuesday, February 11, 2014 5:59:39 PM
To: Argyropoulos, Paul
Subject: RE: you doing okay?

Are you working on Wednesday?

Larry Schafer

National Biodiesel Board

O: (b) (6)

M: (b) (6)

(b) (6)

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Suite 505

Washington DC 20004

From: Argyropoulos, Paul [mailto:(b) (6)]
Sent: Wednesday, February 05, 2014 2:40 PM
To: Larry Schafer
Subject: RE: you doing okay?

Just dandy. You?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: (b) (6)

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

From: Larry Schafer [mailto:(b) (6)]
Sent: Wednesday, February 05, 2014 12:18 PM
To: Argyropoulos, Paul
Subject: you doing okay?

Larry Schafer

National Biodiesel Board

O: 202.(b) (6)

M: (b) (6)

(b) (6)

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